

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

IAN HUNTER LUCAS,)	
Plaintiff,)	Civil Action No. 3:23-cv-01359
)	
v.)	Judge Richardson/Frensley
)	
VANDERBILT UNIVERSITY et al.)	
Defendants.)	

**PLAINTIFF’S MOTION FOR DISQUALIFICATION OF THE
HONORABLE ELI J. RICHARDSON**

Plaintiff, *pro se*, hereby moves this Court for an order disqualifying the Honorable Eli J. Richardson from presiding over this matter, pursuant to 28 U.S.C. §§ 144 and 455. This motion is filed not only because of the Judge’s ongoing professional affiliation with the Defendant Vanderbilt University—creating an appearance of bias and partiality—but also to preserve Plaintiff’s right to appeal on the basis of the judicial bias reflected in the Court’s recent orders and decisions.

As set forth in the accompanying declaration, Judge Richardson is both an alumnus of Vanderbilt University¹ and has served as an Adjunct Professor at Vanderbilt University Law School² from 2016 to the present. This ongoing professional relationship with the Defendant institution is neither remote nor attenuated; instead, it is active and continuing. A reasonable, objective observer would question whether these ties compromise the Judge’s ability to serve as a neutral arbiter.

Recent orders in this action further underscore Plaintiff’s concerns regarding bias. Although the case has been terminated by the filing of Plaintiff’s Notice of Voluntary Dismissal

¹ In this case, the Defendant, Vanderbilt University, exercises direct control over its law school, which functions as an integral part of the University’s academic system rather than as a separate legal entity. Due to the law school’s integrated status, the Court should treat it as indistinguishable from Vanderbilt University for purposes of this litigation.

² See *supra* note 1.

pursuant to Rule 41(a)(1)(A)(i), the adverse and arguably dismissive tone of the Court's decisions prior to dismissal—such as the denial of Plaintiff's Motion for a Temporary Restraining Order on grounds of insufficient specificity and evidentiary support—raise the specter that the Judge's affiliation with Vanderbilt University may have influenced or could be perceived to have influenced those rulings. Plaintiff now files this Motion for Disqualification to ensure that the record clearly reflects his timely objections to the Judge's partiality, so that this issue may be appropriately preserved for appeal.

Under 28 U.S.C. § 144, the timely filing of a sufficient affidavit of bias requires the Judge to proceed no further. Likewise, 28 U.S.C. § 455(a) obligates the Judge to step aside if his impartiality might reasonably be questioned. Here, the Judge's role as an Adjunct Professor at the Defendant's own institution undeniably creates such a reasonable question.

Accordingly, Plaintiff respectfully requests that this Court grant the Motion for Disqualification and assign another judge who is free from any appearance of bias to preside over the proceedings. Filing this Motion in addition to the filed objections now ensures that the Plaintiff's right to appeal on the basis of judicial bias is preserved, maintaining the integrity and fairness of any future proceedings or appellate review.

Dated: December 13, 2024,

Respectfully submitted,

/s/ Ian Hunter Lucas
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CERTIFICATE OF SERVICE

I hereby certify that on December 15, 2024, a copy of the foregoing MOTION FOR DISQUALIFICATION OF THE HONORABLE ELI J. RICHARDSON was served via the Court's electronic filing system upon counsel of record for Defendant.

/s/ Ian Hunter Lucas
IAN HUNTER LUCAS